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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

EMPIRE FIRE AND MARINE INS. CO.,)	Case No.: 2:21-cv-00289-JCM-EJY
)	
Plaintiff,)	STIPULATION TO EXTEND DISCOVERY
)	DEADLINE
vs.)	
)	THIRD REQUEST
NICOLE ELYSE BROOKS, et al.)	
)	
Defendants.)	

Plaintiff Empire Fire and Marine Ins. Co. ("Plaintiff") and Defendants Jose Rodriguez, Jacob Ramirez and Jose Luis Tello-Robles (collectively "Defendants"), by and through counsel, stipulate and agree as follows:

WHEREAS, this matter is an insurance coverage dispute arising from a two (2) vehicle auto accident which involved a vehicle Defendant Nicole Brooks ("Brooks") rented from Malco Enterprises of NV, dba Budget Rent A Car of Las Vegas ("Budget") in which Plaintiff alleges the accident may have been staged;¹

WHEREAS, this court has previously extended the discovery deadline in order to, inter alia, permit for Plaintiff to complete the depositions of third party witnesses Calvin Tucker and Gheta Elliott, each of whom have been served with subpoenas;

WHEREAS, despite best efforts, scheduling conflicts continue to arise such that neither

¹ As Brooks has not appeared, this Court has entered her default. Dkt. No. 17.

deposition has been completed;

WHEREAS, the parties are able to proceed with the deposition of Gheta Elliott on May 5, 2022;

WHEREAS, the parties are able to proceed with the deposition of Calvin Tucker on May 16, 2022;

WHEREFORE, the parties are amenable to extending the discovery deadline until May 16, 2022 to complete these depositions.

IT IS SO STIPULATED.

Dated: April 30, 2022

MORALES FIERRO & REEVES

GEORGE T. BOCHANIS, LTD.

By: /s/ William C. Reeves
William C. Reeves
MORALES FIERRO & REEVES
Attorneys for Plaintiff

By: /s/ Eunice Beattie
Eunice Beattie
GEORGE T. BOCHANIS, LTD.
Attorneys for Defendants

The Court, having considered the Stipulation of the parties and good cause appearing, agrees to to extend the deadline to complete discovery to May 16, 2022 to complete the depositions of Gheta Elliott and Calvin Tucker.

IT IS SO ORDERED:

Dated: May 2, 2022


UNITED STATES MAGISTRATE JUDGE